'764 Patent	Plaintiff's Proposed	Defendants' Proposed	Court's
	Construction	Construction	Construction
"system control means for receiving signals	Not a means-plus-function	Means-plus-function term,	
from said thermosensor and user interface	claim; plain and ordinary	governed by 35 U.S.C. §	
and for processing said signals to generate	meaning; or	112(f).	
appropriate control signals to control said			
fluid supply control valve actuator(s) and	If M+F, alternatively:	Function: Receiving signals	
said flow control valve actuator means to		from said thermosensor and	
achieve programmed or user-selected set	Function: receiving and	user interface and	
temperature, flow rate and volume at said	processing signals	processing said signals to	
system outlet"		generate appropriate control	
	Structure: control unit;	signals to control said fluid	
1. A fluid delivery system for controlling fluid	microprocessor, central	supply control valve	
temperature, flow rate and volume at a system	processing unit, input-output	actuator(s) and said flow	
outlet comprising:	inter-face, digital processor,	control valve actuator	
a fluid supply control valve for regulating	controller, and memory	means to achieve	
flow of a first fluid and a second fluid from		programmed or user-	
corresponding first and second fluid sources		selected set temperature,	
into a mixing port, wherein said first fluid has		flow rate and volume at said	
a different temperature from said second fluid;		system outlet	
a fluid supply control valve actuator			
operatively connected to said fluid supply		Structure: Standalone	
valve for actuating opening and closure		controller, single task	
operations thereof;		control logic unit,	
a thermosensor thermally coupled with said		microprocessor, digital	
mixing port to sense an estimated present		processor control unit, or	
temperature of a mixed fluid within said		CPU, and structural	
mixing port;		equivalents thereof	

remote monitoring/control device also	
operates to receive signals from said system	
control means and/or said one or more system	
sensor(s) to remotely monitor said one or	
more system functions or parameters.	
26. A fluid delivery system for controlling	
fluid temperature, flow rate and volume at a	
system outlet comprising:	
a fluid supply control valve for regulating	
flow of a first fluid and a second fluid from	
corresponding first and second fluid sources	
into a mixing port, wherein said first fluid has	
a different temperature from said second fluid;	
a fluid supply control valve actuator	
operatively connected to said fluid supply	
valve for actuating opening and closure	
operations thereof;	
a thermosensor thermally coupled with said	
mixing port to sense an estimated present	
temperature of a mixed fluid within said	
mixing port;	
a fluid control valve for regulating flow of a	
mixed fluid flow at said system outlet;	
a flow control valve actuator operatively	
connected to said flow control valve for	
actuating opening and closure operations	
thereof;	
a user interface including user input means for	
selecting a set temperature, flow rate and	
volume of fluid at said system outlet and user	

ns for displaying one or more	
tions or parameters;	
rol means for receiving signals	
nermosensor and user interface	
cessing said signals to generate	
control signals to control said	
control valve actuator(s) and	
ntrol valve actuator means to	
·	
or parameter(s).	
•	
± ' '	
JIVI).	
I delivery system of claim 1	
<u> </u>	
I I I	
grammed or user-selected set e, flow rate and volume at said et; and a storage and input means for ransferring data to said system as to control one or more system or parameter(s). I delivery system of claim 1, system control means includes a sor comprising a central nit (CPU) operably connected t/output (I/O) inter-face, random ory (RAM), and read only om only o	

integral plus derivative, or feed forward			
control algorithm.			
"microprocessor comprising a central	Not a means-plus-function	Means-plus-function term,	
processing unit (CPU) operably connected	claim; plain and ordinary	governed by 35 U.S.C. §	
with an input/output (I/O) inter-face,	meaning	112(f).	
random access memory (RAM), and read			
only memory (ROM)"		<u>Function</u> : Receiving signals	
		from said thermosensor and	
10. The fluid delivery system of claim 1,		user interface and	
wherein the system control means includes a		processing said signals to	
microprocessor comprising a central		generate appropriate control	
processing unit (CPU) operably connected		signals to control said	
with an input/output (I/O) inter-face,		supply control valve	
random access memory (RAM), and read		actuator(s) and said flow	
only memory (ROM).		control valve actuator	
		means to achieve	
		programmed or user-	
		selected set temperature,	
		flow rate and volume at said	
		system outlet	
		Structure: This claim	
		element is directed to	
		software and the	
		specification fails to	
		"disclose an algorithm for	
		performing the claimed	
		function." Williamson v.	
		Citrix Online, LLC, 792	
		F.3d 1339, 1352 (Fed. Cir.	

	-	2015) (h) Therefore
		2015) (en banc). Therefore,
		the claim is indefinite.
"programmable digital processor which	Not a means-plus-	Means-plus-function term,
implements feedback control of one or	function claim;	governed by 35 U.S.C. §
more system parameters based on a control	plain and ordinary	112(f).
algorithm that is selected from a	meaning	
proportional, proportional plus integral,		<u>Function</u> : Receiving signals
proportional plus integral plus derivative,		from said thermosensor and
or feed forward control algorithm"		user interface and
		processing said signals to
13. The fluid delivery system of claim 1,		generate appropriate control
wherein the system control means includes a		signals to control said
programmable digital processor which		supply control valve
implements feedback control of one or		actuator(s) and said flow
more system parameters based on a control		control valve actuator
algorithm that is selected from a		means to achieve
proportional, proportional plus integral,		programmed or user-
proportional plus integral plus derivative,		selected set temperature,
or feed forward control algorithm.		flow rate and volume at said
		system outlet
		Structure: This claim
		element is directed to
		software and the
		specification fails to
		"disclose an algorithm for
		performing the claimed
		function." Williamson v.
		Citrix Online, LLC, 792
		F.3d 1339, 1352 (Fed. Cir.
		1.3u 1337, 1332 (17u. Cii.

		2015) (en banc). Therefore,
		the claim is indefinite.
"namata system manitaning/aantual daviaa	Not a means-plus-	Means-plus-function term,
"remote system monitoring/control device	function claim;	
operable for bidirectional data	/	governed by 35 U.S.C. §
transmission and reception between said	plain and ordinary	112(f).
remote monitoring/control device and said	meaning	
system control means and/or system		<u>Function</u> : (i) bidirectional
sensor(s) for remotely monitoring and		data transmission and
controlling said one or more system		reception between said
functions or parameters, wherein said		remote monitoring/control
remote monitoring/control device operates		device and said system
to remotely generate signals to remotely		control means and/or system
select said one or more system functions or		sensor(s) for remotely
parameters, and wherein said remote		monitoring and controlling
monitoring/control device also operates to		said one or more system
receive signals from said system control		functions or parameters; (ii)
means and/or said one or more system		remotely generate signals to
sensor(s) to remotely monitor said one or		remote select said one or
more system functions or parameters"		more system functions or
		parameters; and (iii) receive
1. A fluid delivery system for controlling fluid		signals from said system
temperature, flow rate and volume at a system		control means and/or said
outlet comprising:		one or more system
a fluid supply control valve for regulating		sensor(s) to remotely
flow of a first fluid and a second fluid from		monitor said one or more
corresponding first and second fluid sources		system functions or
into a mixing port, wherein said first fluid has		parameters
a different temperature from said second fluid;		
a fluid supply control valve actuator		Structure: personal
operatively connected to said fluid supply		computer, electronic day
		planner, or computerized

valve for actuating opening and closure	building management
operations thereof;	system, and equivalents
a thermosensor thermally coupled with said	thereof
mixing port to sense an estimated present	
temperature of a mixed fluid within said	This claim element is
mixing port;	directed to software and the
a fluid control valve for regulating flow of a	specification fails to
mixed fluid flow at said system outlet;	"disclose an algorithm for
a flow control valve actuator operatively	performing the claimed
connected to said flow control valve for	function." Williamson v.
actuating opening and closure operations	Citrix Online, LLC, 792
thereof;	F.3d 1339, 1352 (Fed. Cir.
a user interface including user input means for	2015) (en banc). Therefore,
selecting a set temperature, flow rate and	the claim is indefinite.
volume of fluid at said system outlet and user	
display means for displaying one or more	
system functions or parameters;	
system control means for receiving signals	
from said thermosensor and user interface and	
for processing said signals to generate	
appropriate control signals to control said	
fluid supply control valve actuator(s) and said	
flow control valve actuator means to achieve	
programmed or user-selected set temperature,	
flow rate and volume at said system outlet;	
and	
a remote system monitoring/control device	
operable for bidirectional data	
transmission and reception between said	
remote monitoring/control device and said	
system control means and/or system	

sensor(s) for remotely monitoring and controlling said one or more system functions or parameters, wherein said remote monitoring/control device operates to remotely generate signals to remotely select said one or more system functions or parameters, and wherein said remote monitoring/control device also operates to receive signals from said system control means and/or said one or more system sensor(s) to remotely monitor said one or more system functions or parameters.			
4. The fluid delivery system of claim 1, wherein the remote system monitoring/control device sends and receives signals to and from the system control means and/or system sensor(s) via an electrical, infrared (IR), radio frequency (RF), internet, intranet, direct connect remote access, satellite, or laser control connection means.			
7. The fluid delivery system of claim 1, wherein the user interface input is a remote user input selected from a keypad, touchpad, joystick, roller, pen selector, voice input, or optical input integrated within the remote system monitoring/control device.			
"fluid supply control valve"	Plain and ordinary meaning	Electronically controlled	
	Or, in the alternative:	valve capable of opening and closing smoothly,	

1. A fluid delivery system for controlling fluid temperature, flow rate and volume at a system outlet comprising: a fluid supply control valve for regulating flow of a first fluid and a second fluid from corresponding first and second fluid sources into a mixing port, wherein said first fluid has a different temperature from said second fluid; a fluid supply control valve actuator operatively connected to said fluid supply valve for actuating opening and closure operations thereof; a thermosensor thermally coupled with said mixing port to sense an estimated present temperature of a mixed fluid within said mixing port; a fluid control valve for regulating flow of a mixed fluid flow at said system outlet; a flow control valve actuator operatively connected to said flow control valve for	valve which regulates flow from a fluid supply	rapidly, and with adequate precision to achieve fine control of fluid supply	
· ·			
-			
actuating opening and closure operations			
thereof;			
a user interface including user input means for selecting a set temperature, flow rate and			
volume of fluid at said system outlet and user			
display means for displaying one or more			
system functions or parameters;			
system control means for receiving signals			
from said thermosensor and user interface and			
for processing said signals to generate			
appropriate control signals to control said			

	1	
fluid supply control valve actuator(s) and said		
flow control valve actuator means to achieve		
programmed or user-selected set temperature,		
flow rate and volume at said system outlet;		
and		
a remote system monitoring/control device		
operable for bidirectional data transmission		
and reception between said remote		
monitoring/control device and said system		
control means and/or system sensor(s) for		
remotely monitoring and controlling said one		
or more system functions or parameters,		
wherein said remote monitoring/control		
device operates to remotely generate signals to		
remotely select said one or more system		
functions or parameters, and wherein said		
remote monitoring/control device also		
operates to receive signals from said system		
control means and/or said one or more system		
sensor(s) to remotely monitor said one or		
more system functions or parameters.		
26. A fluid delivery system for controlling		
fluid temperature, flow rate and volume at a		
system outlet comprising:		
a fluid supply control valve for regulating		
flow of a first fluid and a second fluid from		
corresponding first and second fluid sources		
into a mixing port, wherein said first fluid has		
a different temperature from said second fluid;		

	T
a fluid supply control valve actuator	
operatively connected to said fluid supply	
valve for actuating opening and closure	
operations thereof;	
a thermosensor thermally coupled with said	
mixing port to sense an estimated present	
temperature of a mixed fluid within said	
mixing port;	
a fluid control valve for regulating flow of a	
mixed fluid flow at said system outlet;	
a flow control valve actuator operatively	
connected to said flow control valve for	
actuating opening and closure operations	
thereof;	
a user interface including user input means for	
selecting a set temperature, flow rate and	
volume of fluid at said system outlet and user	
display means for displaying one or more	
system functions or parameters;	
system control means for receiving signals	
from said thermosensor and user interface and	
for processing said signals to generate	
appropriate control signals to control said	
fluid supply control valve actuator(s) and said	
flow control valve actuator means to achieve	
programmed or user-selected set temperature,	
flow rate and volume at said system outlet;	
and	
external data storage and input means for	
storing and transferring data to said system	

control means to control one or more system			
function(s) or parameter(s).			
"fluid control valve"	Plain and ordinary meaning	"Flow control valve"	
1. A fluid delivery system for controlling fluid	Or, in the alternative:	Construed as: Electronically	
temperature, flow rate and volume at a system	valve which regulates the	controlled valve capable of	
outlet comprising:	flow of a mixed fluid	opening and closing	
a fluid supply control valve for regulating		smoothly, rapidly, and with	
flow of a first fluid and a second fluid from		adequate precision to	
corresponding first and second fluid sources		achieve fine control of flow	
into a mixing port, wherein said first fluid has			
a different temperature from said second fluid;			
a fluid supply control valve actuator			
operatively connected to said fluid supply			
valve for actuating opening and closure			
operations thereof;			
a thermosensor thermally coupled with said			
mixing port to sense an estimated present			
temperature of a mixed fluid within said			
mixing port;			
a fluid control valve for regulating flow of a			
mixed fluid flow at said system outlet;			
a flow control valve actuator operatively			
connected to said flow control valve for			
actuating opening and closure operations			
thereof;			
a user interface including user input means for			
selecting a set temperature, flow rate and			
volume of fluid at said system outlet and user			
display means for displaying one or more			
system functions or parameters;			

system control means for receiving signals	
from said thermosensor and user interface and	
for processing said signals to generate	
appropriate control signals to control said	
fluid supply control valve actuator(s) and said	
flow control valve actuator means to achieve	
programmed or user-selected set temperature,	
flow rate and volume at said system outlet;	
and	
a remote system monitoring/control device	
operable for bidirectional data transmission	
and reception between said remote	
monitoring/control device and said system	
control means and/or system sensor(s) for	
remotely monitoring and controlling said one	
or more system functions or parameters,	
wherein said remote monitoring/control	
device operates to remotely generate signals to	
remotely select said one or more system	
functions or parameters, and wherein said	
remote monitoring/control device also	
operates to receive signals from said system	
control means and/or said one or more system	
sensor(s) to remotely monitor said one or	
more system functions or parameters.	
26. A fluid delivery system for controlling	
fluid temperature, flow rate and volume at a	
system outlet comprising:	
a fluid supply control valve for regulating	
flow of a first fluid and a second fluid from	

corresponding first and second fluid sources		
into a mixing port, wherein said first fluid has		
a different temperature from said second fluid;		
a fluid supply control valve actuator		
operatively connected to said fluid supply		
valve for actuating opening and closure		
operations thereof;		
a thermosensor thermally coupled with said		
mixing port to sense an estimated present		
temperature of a mixed fluid within said		
mixing port;		
a fluid control valve for regulating flow of a		
mixed fluid flow at said system outlet;		
a flow control valve actuator operatively		
connected to said flow control valve for		
actuating opening and closure operations		
thereof;		
a user interface including user input means for		
selecting a set temperature, flow rate and		
volume of fluid at said system outlet and user		
display means for displaying one or more		
system functions or parameters;		
system control means for receiving signals		
from said thermosensor and user interface and		
for processing said signals to generate		
appropriate control signals to control said		
fluid supply control valve actuator(s) and said		
flow control valve actuator means to achieve		
programmed or user-selected set temperature,		
flow rate and volume at said system outlet;		
and		

external data storage and input means for storing and transferring data to said system control means to control one or more system		
function(s) or parameter(s).		
"user interface input"	Plain and ordinary meaning	Construed as "user input
		means for"
7. The fluid delivery system of claim 1 ,	Or, in the alternative:	
wherein the user interface input is a remote	input to the user interface	See AGREED definition of:
user input selected from a keypad, touchpad,		"User input means for"
joystick, roller, pen selector, voice input, or		
optical input integrated within the remote		Alternatively, claim 7 is
system monitoring/control device.		invalid as indefinite for lack
		of antecedent basis because
		there is no "user interface
		input" recited in
		independent Claim 1.
		Halliburton Energy Servs. v.
		<i>M-I LLC</i> , 514 F.3d 1244,
		1249 (Fed. Cir. 2008).
"fluid supply control valve actuator for	Not a means-plus-function	Means-plus-function term,
actuating opening and closure operations	claim; plain and	governed by 35 U.S.C. §
thereof"	ordinary meaning	112(f).
1. A fluid delivery system for controlling fluid	If M+F, alternatively:	<u>Function</u> : actuating opening
temperature, flow rate and volume at a system		and closure operations of a
outlet comprising:	Function: valve actuation	fluid supply control valve,
a fluid supply control valve for regulating		which valve must be
flow of a first fluid and a second fluid from	Structure: control motor,	capable of opening and
corresponding first and second fluid sources	stepper motor, solenoid,	closing smoothly, rapidly,
into a mixing port, wherein said first fluid has	electronic valve controller,	and with adequate precision
a different temperature from said second fluid;	electric, pneumatic,	to achieve fine control of

a fluid supply control valve actuator	hydraulic, or magnetic	fluid supply, where the	
operatively connected to said fluid supply	driven motor	actuator moves a valve	
valve for actuating opening and closure		member in relationship to	
operations thereof;		an associated valve seat to	
a thermosensor thermally coupled with said		open or close the valve	
mixing port to sense an estimated present			
temperature of a mixed fluid within said		Structure: electric,	
mixing port;		pneumatic, hydraulic, or	
a fluid control valve for regulating flow of a		mechanically driven motor,	
mixed fluid flow at said system outlet;		or solenoid, and structural	
a flow control valve actuator operatively		equivalents thereof	
connected to said flow control valve for			
actuating opening and closure operations			
thereof;			
a user interface including user input means for			
selecting a set temperature, flow rate and			
volume of fluid at said system outlet and user			
display means for displaying one or more			
system functions or parameters;			
system control means for receiving signals			
from said thermosensor and user interface and			
for processing said signals to generate			
appropriate control signals to control said			
fluid supply control valve actuator(s) and			
said flow control valve actuator means to			
achieve programmed or user-selected set			
temperature, flow rate and volume at said			
system outlet; and			
a remote system monitoring/control device			
operable for bidirectional data transmission			
and reception between said remote			

monitoring/control device and said system	
control means and/or system sensor(s) for	
remotely monitoring and controlling said one	
or more system functions or parameters,	
wherein said remote monitoring/control	
device operates to remotely generate signals to	
remotely select said one or more system	
functions or parameters, and wherein said	
remote monitoring/control device also	
operates to receive signals from said system	
control means and/or said one or more system	
sensor(s) to remotely monitor said one or	
more system functions or parameters.	
26. A fluid delivery system for controlling	
fluid temperature, flow rate and volume at a	
system outlet comprising:	
a fluid supply control valve for regulating	
flow of a first fluid and a second fluid from	
corresponding first and second fluid sources	
into a mixing port, wherein said first fluid has	
a different temperature from said second fluid;	
a fluid supply control valve actuator	
operatively connected to said fluid supply	
valve for actuating opening and closure	
operations thereof;	
a thermosensor thermally coupled with said	
mixing port to sense an estimated present	
temperature of a mixed fluid within said	
mixing port;	

T	1	1
Not a means-plus-function	Means-plus-function term,	
claim; plain and	governed by 35 U.S.C. §	
ordinary meaning	112(f).	
If M+F, alternatively:	<u>Function</u> : actuating opening	
_	and closure operations of a	
	flow control valve, which	
	claim; plain and ordinary meaning	claim; plain and ordinary meaning If M+F, alternatively: governed by 35 U.S.C. § 112(f). Function: actuating opening and closure operations of a

	<u> </u>	1	
a fluid supply control valve for regulating	Function: opening or	valve must be capable of	
flow of a first fluid and a second fluid from	closing a valve	opening and closing	
corresponding first and second fluid sources		smoothly, rapidly, and with	
into a mixing port, wherein said first fluid has	Structure: control motor,	adequate precision to	
a different temperature from said second fluid;	stepper motor, solenoid,	achieve fine control of flow,	
a fluid supply control valve actuator	electronic valve controller,	where the actuator moves a	
operatively connected to said fluid supply	electric, pneumatic,	valve member in	
valve for actuating opening and closure	hydraulic, or magnetic	relationship to an associated	
operations thereof;	driven motor	valve seat to open or close	
a thermosensor thermally coupled with said		the valve	
mixing port to sense an estimated present			
temperature of a mixed fluid within said		Structure: electric,	
mixing port;		pneumatic, hydraulic, or	
a fluid control valve for regulating flow of a		magnetically driven motor,	
mixed fluid flow at said system outlet;		or solenoid, and structural	
a flow control valve actuator operatively		equivalents thereof	
connected to said flow control valve for			
actuating opening and closure operations			
thereof;			
a user interface including user input means for			
selecting a set temperature, flow rate and			
volume of fluid at said system outlet and user			
display means for displaying one or more			
system functions or parameters;			
system control means for receiving signals			
from said thermosensor and user interface and			
for processing said signals to generate			
appropriate control signals to control said			
fluid supply control valve actuator(s) and said			
flow control valve actuator means to achieve			
programmed or user-selected set temperature,			

flow rate and volume at said system outlet;		
and		
a remote system monitoring/control device		
operable for bidirectional data transmission		
and reception between said remote		
monitoring/control device and said system		
control means and/or system sensor(s) for		
remotely monitoring and controlling said one		
or more system functions or parameters,		
wherein said remote monitoring/control		
device operates to remotely generate signals to		
remotely select said one or more system		
functions or parameters, and wherein said		
remote monitoring/control device also		
operates to receive signals from said system		
control means and/or said one or more system		
sensor(s) to remotely monitor said one or		
more system functions or parameters.		
26. A fluid delivery system for controlling		
fluid temperature, flow rate and volume at a		
system outlet comprising:		
a fluid supply control valve for regulating		
flow of a first fluid and a second fluid from		
corresponding first and second fluid sources		
into a mixing port, wherein said first fluid has		
a different temperature from said second fluid;		
a fluid supply control valve actuator		
operatively connected to said fluid supply		
valve for actuating opening and closure		
operations thereof;		

a thermosensor thermally coupled with said			
mixing port to sense an estimated present			
temperature of a mixed fluid within said			
mixing port;			
a fluid control valve for regulating flow of a			
mixed fluid flow at said system outlet;			
a flow control valve actuator operatively			
connected to said flow control valve for			
actuating opening and closure operations			
thereof;			
a user interface including user input means for			
selecting a set temperature, flow rate and			
volume of fluid at said system outlet and user			
display means for displaying one or more			
system functions or parameters;			
system control means for receiving signals			
from said thermosensor and user interface and			
for processing said signals to generate			
appropriate control signals to control said			
fluid supply control valve actuator(s) and said			
flow control valve actuator means to achieve			
programmed or user-selected set temperature,			
flow rate and volume at said system outlet;			
and			
external data storage and input means for			
storing and transferring data to said system			
control means to control one or more system			
function(s) or parameter(s).			
"memory means for entry and storage of	Not a means-plus-function	Means-plus-function term,	
user-defined temperature settings"	claim; plain and ordinary	governed by 35 U.S.C. §	
	meaning	112(f).	

6. The fluid delivery system of claim 1, wherein the thermosensor incorporates memory means for entry and storage of user-defined temperature settings.	If M+F, alternatively: Function: entry and storage of data	Function: Entry and storage of user-defined temperature settings in a nonvolatile memory device	
	Structure: computer memory	Structure: This claim term fails to recite sufficiently definite structure and the '764 patent fails to disclose any structure corresponding to the "memory means." Williamson v. Citrix Online, LLC, 792 F.3d 1339, 1351 (Fed. Cir. 2015) (en banc). Therefore, the claim is indefinite.	
"domestic water supply system"	Not a means-plus-function claim; plain and ordinary	Means-plus-function term, governed by 35 U.S.C. §	
24. The fluid delivery system of claim 1 which comprises a domestic water supply system.	meaning	Structure: Fig. 1, Fig. 3, Fig. 4, and equivalents thereof This claim term fails to recite sufficiently definite structure, and thus 35 U.S.C. § 112(f) applies. Williamson v. Citrix Online, LLC, 792 F.3d 1339, 1349 (Fed. Cir. 2015) (en banc)	

"external data storage and input means for
storing and transferring data to said system
control means to control one or more
system function(s) or parameter(s)"

26. A fluid delivery system for controlling fluid temperature, flow rate and volume at a system outlet comprising:

a fluid supply control valve for regulating flow of a first fluid and a second fluid from corresponding first and second fluid sources into a mixing port, wherein said first fluid has a different temperature from said second fluid; a fluid supply control valve actuator operatively connected to said fluid supply valve for actuating opening and closure operations thereof;

a thermosensor thermally coupled with said mixing port to sense an estimated present temperature of a mixed fluid within said mixing port;

a fluid control valve for regulating flow of a mixed fluid flow at said system outlet; a flow control valve actuator operatively connected to said flow control valve for actuating opening and closure operations thereof;

a user interface including user input means for selecting a set temperature, flow rate and volume of fluid at said system outlet and user Not a means-plus-function claim; plain and ordinary meaning.

If M+F, alternatively:

Function: storing and transferring data

[AGREED] Structure:

personal computer; electronic day planner; computerized building management system; external data processing device; personal data storage template; hard disk; floppy disk; zip or jaz drive; CD-ROM; magnetic or optical data storage devices Means-plus-function term, governed by 35 U.S.C. § 112(f).

<u>Function</u>: storing and transferring data to said system control means to control one or more system function(s) or parameter(s)

[AGREED] Structure:

personal computer; electronic day planner; computerized building management system; external data processing device; personal data storage template; hard disk; floppy disk; zip or jaz drive; CD-ROM; magnetic or optical data storage devices

Case 2:16-cv-00689-RSP Document 61-1 Filed 05/10/17 Page 25 of 25 PageID #: 860

display means for displaying one or more		
system functions or parameters;		
system control means for receiving signals		
from said thermosensor and user interface and		
for processing said signals to generate		
appropriate control signals to control said		
fluid supply control valve actuator(s) and said		
flow control valve actuator means to achieve		
programmed or user-selected set temperature,		
flow rate and volume at said system outlet;		
and		
external data storage and input means for		
storing and transferring data to said system		
control means to control one or more		
system function(s) or parameter(s).		